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International Union Health and Welfare Fund**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE ABBOTT LABORATORIES  
NORVIR ANTITRUST LITIGATION

No. C-04-1511 CW

**STIPULATION AND ORDER RE:  
EXTENDING MOTION TO COMPEL  
DEADLINE AS TO PRIVILEGE ISSUES**

WHEREAS, under the Court's July 2, 2007 scheduling order, the present deadline for filing motions to compel with respect to fact discovery is August 31, 2007;

WHEREAS, the parties have been meeting and conferring about the propriety of privilege assertions as the basis for withholding or redacting documents responsive to discovery requests;

WHEREAS, the parties require a short extension of time beyond the August 31, 2007

[C-04-1511 CW] STIPULATION AND [PROPOSED] ORDER RE: EXTENDING MOTION  
TO COMPEL DEADLINE AS TO PRIVILEGE ISSUES

1 motion to compel deadline to complete their meet and confer communications about privilege  
2 assertions in order to attempt to eliminate, or at least to substantially narrow, any disputes as to  
3 privilege issues that might otherwise require the Court's intervention to resolve;

4 IT IS THEREFORE STIPULATED by and between the parties, acting through their  
5 counsel of record, that, subject to the Court's approval, the deadline for filing motions to compel  
6 as to privilege assertions is extended from August 31, 2007 to September 14, 2007.

7 Dated: August 31, 2007

Respectfully submitted,

8 **BERMAN DEVALERIO PEASE TABACCO**  
9 **BURT & PUCILLO**

10 By: /s/ Christopher T. Heffelfinger  
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**E-Filing Attestation**

I, Christopher T. Heffelfinger, am the ECF User whose ID and password are being used to file this document. In compliance with General Order 45 X.B., I hereby attest that DAVID J. DOYLE, whose e-filing signature appears below, has concurred in the filing of this document.

Dated: August 31, 2007

**WINSTON & STRAWN**

By: /s/ David J. Doyle  
DAVID J. DOYLE

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**Attorneys for Defendant  
ABBOTT LABORATORIES**

**ORDER**

IT IS SO ORDERED.

9/5/07

Dated: \_\_\_\_\_



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HON. CLAUDIA WILKEN

UNITED STATES DISTRICT JUDGE

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